

MORGAN, LEWIS & BOCKIUS LLP
Andrew J. Gray IV (CA Bar No. 202137)
Ahren C. Hoffman (CA Bar No. 250469)
2 Palo Alto Square
3000 El Camino Real, Suite 700
Palo Alto, CA 94306-2212
Tel: 650.843.4000
Fax: 650.843.4001
E-mail: agray@morganlewis.com
E-mail: ahoffman@morganlewis.com

Attorneys for Plaintiff
CORSAIR MEMORY, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CORSAIR MEMORY, INC.,

Plaintiff,

v.

CORSAIR7.COM,

Defendant.

ADR
E-filing
FILED
JUL 17 2008
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

COS COMPL 03460
HRL

Plaintiff CORSAIR MEMORY, INC. ("Corsair"), by its attorneys, Morgan, Lewis & Bockius LLP, for its Complaint in this action alleges:

PARTIES

1. Corsair is a Delaware corporation with its corporate headquarters at 46221 Landing Parkway, Fremont, California 94538.

2. The records of the domain name registrar for the CORSAIR7.COM domain name identify the Registrant of the domain name as Dongju Son, Singga Commercial Centre, Rm. 1203-04, 148 Connaught Rd. West, Hong Kong, KR 8100041 with an email address at sondongju@gmail.com. The WHOIS Data for the CORSAIR7.COM domain name is attached hereto as Exhibit A.

DOMAIN NAME REGISTRAR AND REGISTRY

3. The domain name registrar for the CORSAIR7.COM domain name is GMO

1 Internet, Inc., doing business as ONAMAE.COM and DISCOUNT-DOMAIN.COM, having its
2 principal place of business at Cerulean Tower, 26-1, Sakuragaoka-cho, Shibuya-ku, Tokyo,
3 Japan.

4 4. The domain name registry for the CORSAIR7.COM domain name is VeriSign,
5 Inc., a Delaware corporation having its corporate headquarters at 487 East Middlefield Road,
6 Mountain View, California 94043.

7 **JURISDICTION AND VENUE**

8 5. This Court has *in rem* jurisdiction over the CORSAIR7.COM domain name
9 pursuant to 15 U.S.C. § 1125(d)(2) because it constitutes personal property located within the
10 territorial jurisdiction of the United States and this judicial district.

11 6. Pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II), Corsair was not able to locate
12 Dongju Son or any other person who would have been a defendant in a civil action under 15
13 U.S.C. § 1125(d)(1). Corsair's due diligence in attempting to locate Dongju Son is described in
14 Paragraphs 14 and 15 of this Complaint. Accordingly, Corsair is entitled by statute to bring this
15 *in rem* action.

16 7. Venue is proper in this judicial district pursuant to 15 U.S.C. § 1125(d)(2) because
17 Verisign, Inc., the registry of the CORSAIR7.COM domain name, is located in this judicial
18 district.

19 **FACTS RELEVANT TO ALL CLAIMS**

20 8. Corsair is a leading provider of high-performance computer components, including
21 memory modules, liquid cooling units and blocks, and power supplies, to computer manufacturers
22 in the United States and throughout the world.

23 9. Corsair has been a leader in the design and manufacture of high-performance
24 computer components since 1994. In this regard, since at least as early as 1994, Corsair has used
25 its distinctive CORSAIR trademark in connection with high performance computer components,
26 including memory modules and liquid cooling units. A copy of Corsair's relevant U.S. trademark
27 registration is attached hereto as Exhibit B.

28 10. By virtue of Corsair's continuous and exclusive use, advertising, and promotion,

1 the CORSAIR trademark has come to symbolize extensive goodwill owned by Corsair. The
2 CORSAIR trademark and the goodwill associated therewith represent an extremely valuable asset
3 to Corsair. As a result of Corsair's efforts and investment, the CORSAIR trademark has attained
4 substantial selling power and is well recognized among customers in the high performance
5 memory industry as identifying Corsair and its products.

6 11. In addition, Corsair owns the CORSAIR.COM domain name, which it uses to
7 market its high-performance computer components.

8 12. On or about September 10, 2007, Dongju Son registered the CORSAIR7.COM
9 domain name, and began using it to promote and sell pornographic videos and other adult
10 products. A copy of the WHOIS data for the CORSAIR7.COM domain name is attached hereto
11 as Exhibit A. A copy of the website at CORSAIR7.COM is attached hereto as Exhibit C.

12 13. On December 13, 2007, promptly upon discovering Dongju Son's improper
13 registration of the CORSAIR7.COM domain name, Corsair sent a cease and desist letter to
14 Dongju Son at the mailing address and email address listed in the WHOIS data for the
15 CORSAIR7.COM domain name. A copy of Corsair's December 13, 2007 cease and desist letter
16 is attached as Exhibit D.

17 14. On information and belief, Dongju Son received Corsair's December 13, 2007
18 cease and desist letter because we e-mailed an electronic copy to sondongju@gmail.com and did
19 not receive a bounce back e-mail stating that our e-mail was undeliverable. With regard to the
20 copy sent by mail, the postal service returned the December 13, 2007 letter as undeliverable. A
21 copy of the returned envelope is attached as Exhibit E.

22 15. Notwithstanding Dongju Son's knowledge of Corsair's prior rights in the
23 CORSAIR trademark (which is imputed to Dongju Son by virtue of registration on the United
24 States Patent and Trademark Office's Principal Register), Dongju Son is promoting and selling
25 pornographic and adult products that are inapposite to Corsair's business and its CORSAIR
26 trademark in California, throughout the United States, and in this judicial district, with the
27 deliberate and calculated intent to trade on the substantial goodwill and reputation symbolized by
28 Corsair's CORSAIR trademark to confuse and mislead the public.

16. Dongju Son's unlawful registration and use of the CORSAIR7.COM domain name is likely to cause confusion, to cause mistake, and to deceive as to the origin, source, or sponsorship of the CORSAIR7.COM domain name among the public and Corsair's customers, as well as dilution of the distinctiveness and value of Corsair's famous CORSAIR trademark.

17. On information and belief, Dongju Son illegitimately registered and is using the CORSAIR7.COM domain name in bad faith, with full knowledge of Corsair's prior use of the CORSAIR trademark and with a bad faith intent to profit from the substantial goodwill associated with Corsair's CORSAIR trademark. Such bad faith is evident from, *inter alia*, Dongju Son's lack of rights in the CORSAIR trademark and CORSAIR7.COM domain name; the fact that CORSAIR7.COM domain name does not consist of Dongju Son's legal name or a name used to identify Dongju Son; Dongju Son's lack of prior use of the CORSAIR7.COM domain name in connection with a bona fide offering of goods or services; Dongju Son's lack of a bona fide or noncommercial use of the CORSAIR trademark; Dongju Son's intent to create a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the CORSAIR7.COM domain name; and the fact that Corsair's CORSAIR trademark is distinct and famous within the meaning of 15 U.S.C. § 1125(c)(1).

COUNT I

IN REM CYBERSQUATTING UNDER § 1125(d)(2) OF THE LANHAM ACT

18. Paragraphs 1-17, above, are realleged and incorporated by reference as if set forth in full.

19. Dongju Son's aforesaid acts constitute a bad faith intent to profit from Corsair's CORSAIR trademark, and Dongju Son's registration and use of a domain name that is confusingly similar to and dilutive of Corsair's distinctive and famous CORSAIR trademark violate Corsair's rights under the Anticybersquatting Consumer Protection Act of 1999, as amended, 15 U.S.C. § 1125(d).

20. Dongju Son's aforesaid acts constitute trademark infringement because they are

likely to cause confusion, to cause mistake, and to deceive as to the origin, source, or sponsorship of the CORSAIR7.COM domain name among the public and Corsair's customers.

21. Dongju Son's aforesaid acts constitute trademark dilution because they dilute and lessen the distinctiveness and value of Corsair's famous CORSAIR trademark.

22. Dongju Son's aforesaid acts have caused and will continue to cause great and irreparable injury to Corsair and, unless such acts are restrained by this Court, they will be continued and Corsair will continue to suffer great and irreparable injury.

23. Corsair has no adequate remedy at law.

WHEREFORE, Corsair prays that the Court:

(i) direct Verisign, Inc. to change the registrar of record for the CORSAIR7.COM domain name to a registrar selected by Corsair;


(ii) direct GMO Internet, Inc. to transfer and register the CORSAIR7.COM domain name to Corsair Memory, Inc.; and

(iii) award such other and further relief that this Court may deem just and equitable.

Dated: July 17, 2008

MORGAN, LEWIS & BOCKIUS LLP

By



Andrew J. Gray IV
Ahren C. Hoffman
Attorneys for Plaintiff
CORSAIR MEMORY, INC.

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WHOIS

Search Results for: **CORSAIR7.COM**

Search Again

Enter a Domain Name to Check

GMO Internet, Inc. whois server 2.0

This server only serves information on GMO Internet, Inc.-maintained domain names
For more information, please contact hostmaster@gmo.jp.

Domain Handle:
Domain Name: corsair7.com
Created On: 2007-09-10 16:49:43.0
Last Updated On: 2007-09-26 11:20:49.0
Expiration Date: 2008-09-10 07:49:42.0
Status: ACTIVE
Registrant Name: dongju son
Registrant Organization: dongju son
Registrant Street1: West, 148 Connaught Rd.
Registrant Street2: Singga Commercial CentreRm. 1203-04
Registrant City: Hong Kong
Registrant State: xxx
Registrant Postal Code: 8100041
Registrant Country: KR
Registrant Phone: 82-00-000-0000
Registrant Fax:
Registrant Email: sondongju@gmail.com
Admin Name: dongju son
Admin Organization: dongju son
Admin Street1: West, 148 Connaught Rd.
Admin Street2: Singga Commercial CentreRm. 1203-04
Admin City: Hong Kong
Admin State: xxx
Admin Postal Code: 8100041
Admin Country: KR
Admin Phone: 82-00-000-0000
Admin Fax:
Admin Email: sondongju@gmail.com
Billing Name: dongju son
Billing Organization: dongju son
Billing Street1: West, 148 Connaught Rd.
Billing Street2: Singga Commercial CentreRm. 1203-04
Billing City: Hong Kong
Billing State: xxx
Billing Postal Code: 8100041
Billing Country: KR
Billing Phone: 82-00-000-0000
Billing Fax:
Billing Email: sondongju@gmail.com
Tech Name: dongju son
Tech Organization: dongju son
Tech Street1: West, 148 Connaught Rd.
Tech Street2: Singga Commercial CentreRm. 1203-04
Tech City: Hong Kong
Tech State: xxx
Tech Postal Code: 8100041
Tech Country: KR

Available TLDs

- ☐ CORSAIR7.NET \$9.99/yr
- ☐ CORSAIR7.ORG \$9.99/yr
- ☐ CORSAIR7.INFO \$1.99/yr
- SAVE!
- ☐ CORSAIR7.BIZ \$14.99/yr
- ☐ CORSAIR7.US \$12.99/yr
- ☐ CORSAIR7.NAMES \$14.99/yr

You might also consider:

- ☐ CORSAIR7SITE.COM \$9.99/yr
- ☐ SITECORSAIR7.COM \$9.99/yr
- ☐ CORSAIR7ONLINE.COM \$9.99/yr
- ☐ ONLINECORSAIR7.COM \$9.99/yr
- ☐ CORSAIR7STORE.COM \$9.99/yr
- ☐ STORECORSAIR7.COM \$9.99/yr
- ☐ CORSAIR7NOW.INFO \$9.99/yr
- SAVE!
- ☐ NOWCORSAIR7.INFO \$9.99/yr
- SAVE!
- ☐ CORSAIR7BLOG.COM \$12.99/yr
- ☐ BLOGCORSAIR7.COM \$12.99/yr
- ☐ CORSAIR7SHOP.COM \$12.99/yr
- ☐ SHOPCORSAIR7.COM \$12.99/yr
- ☐ CORSAIR7TODAY.COM \$12.99/yr

REGISTER NOW!

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\$1.99 Domain Names
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[Fast, secure, reliable hosting featuring 99.9% uptime, free setup, 24/7 support & more!](#)

Safe, Personalized Email
[Get an easy-to-remember email address with built-in Fraud, Spam & Virus Protection.](#)

Tech Phone: 82-00-000-0000
Tech Fax:
Tech Email: sondongju@gmail.com
Name Server: dns5.joesdns.net
Name Server: dns6.joesdns.net

24/7 Sales and Support: (480) 505-8877 » Billing Questions? Call (480) 505-8877

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GoDaddy.tv | GoDaddyLive.com | BobParsons.tv | GoC
DomainNameAftermarket.com | GoDs

Registry Status: ok

See Underlying Registry Data



GoDaddy.com is the world's No. 1 ICANN-accredited domain name registrar for .COM, .NET, .ORG, .INFO, .BIZ and .US domain extensions. Source: Name Intelligence, Inc. 2008

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Int. Cl.: 9

Prior U.S. Cls.: 21, 23, 26, 36 and 38

United States Patent and Trademark Office

Reg. No. 3,209,882

Registered Feb. 20, 2007

**TRADEMARK
PRINCIPAL REGISTER**

CORSAIR

CORSAIR MEMORY, INC. (CALIFORNIA CORPORATION)
44141 S. GRIMMER BLVD.
FREMONT, CA 94538

FOR: HIGH PERFORMANCE COMPUTER COMPONENTS, NAMELY MEMORY MODULES; LIQUID COOLING SYSTEMS FOR COMPUTERS, COMPRISED OF, WATER COOLED HEAT SINKS, PUMPS, RADIATORS, RESERVIOR FANS AND

COOLING BLOCKS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 1-0-1994; IN COMMERCE 1-0-1994.

SER. NO. 76-535,591, FILED 7-25-2003.

SCOTT BALDWIN, EXAMINING ATTORNEY

無修正裏・アダルトDVD通販

CORSAIR 7

ENTER

優良HP検索

-[AWALKER]-

★imodeBEST100★

超暇つぶしにGo!

AMax☆Adult

★Mobile-Station★

人気サイトが集結!!

アダルト★パラダイス

アダルト検索

♪mania x

【エロギャル♀無料動画】

裸の制服娘

放送事故HHH動画

残酷★エロ動画

【無料動画ぱいぱん】

★AdultNews★

《⑱歳以上入口》

SUPER☆SEARCH

アダルト検索SPICY

iYappoランキング 参加中

是非投票してね!

アダルト Googlu

新Seek

もばいる放浪記

携帯サイトの歩き方

＝最新サイト検索＝

☆TUNAGARI☆

アダルトシーカー

アダルトスーパーサーチアイ

携帯検索情報局

ORANGE NAVI

SMへの扉

アダルト検索SPICY

ビンビン萌えサーチ

裏モノJAPAN

♪mania x

◆Night Work's RANKING◆

SEXY RANK

アダルトれすとらん

女子校★過激裏画像

携-M E N U

HでPOPなランキング

SexySearch

【無料動画ばいぱん】

残酷★エロ動画

放送事故HHH動画

裸の制服娘

【エロギャル♀無料動画】

AMax☆Adult

アダルト検索アダルトエンジェル

SiteRank

検索

キーワード 検索

検索

◎ AND ○ OR

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Morgan, Lewis & Bockius LLP
2 Palo Alto Square
3000 El Camino Real, Suite 700
Palo Alto, CA 94306-2122
Tel. 650.843.4000
Fax: 650.843.4001
www.morganlewis.com

Morgan Lewis
C O U N S E L O R S A T L A W

Andrew J. Gray IV
Partner

December 13, 2007

VIA AIRMAIL AND E-MAIL sondongju@gmail.com

Dongju Son
Singa Commercial Centre, Rm. 1203-04
148 Connaught Rd. West
Hong Kong
R.O.C.

Re: Infringing Registration and Use of CORSAIR7.COM

Gentlemen:

We represent Corsair Memory, Inc. ("Corsair") in its trademark and unfair competition matters. As you may know, Corsair provides high performance computer and flash memory products in the United States and throughout the world.

In this regard, Corsair owns numerous U.S. and international trademark registrations and application for marks consisting of or including CORSAIR in connection with high performance computer and flash memory, including U.S. trademark Registration No. 3,209,882 for CORSAIR. As a result of widespread use and significant annual sales, as well as through extensive advertising and publicity, the CORSAIR name and mark has become well-known among the high performance memory industry as identifying Corsair and its products and represents substantial good will.

It has come to our attention that Dongju Son has registered the CORSAIR7.COM domain name and is using Corsair's distinctive CORSAIR name and mark to promote and sell pornographic videos and other adult products. Dongju Son's unauthorized use of the CORSAIR designation is likely to cause confusion, mistake and deception among consumers so that consumers will believe that the CORSAIR7.COM website is Corsair's website or is sponsored, licensed or authorized by Corsair. In addition, Dongju Son's use of CORSAIR7.COM to promote and sell pornographic videos and other adult products tarnishes and disparages Corsair's CORSAIR trademark and the goodwill associated with it.

Dongju Son
December 13, 2007
Page 2

Morgan Lewis
COUNSELORS AT LAW

Such unauthorized use of Corsair's CORSAIR name and mark constitutes, among other things, federal trademark infringement under 15 U.S.C. § 1114, federal unfair competition under 15 U.S.C. § 1125, federal trademark dilution under 15 U.S.C. § 1125, federal cybersquatting under 15 U.S.C. § 1125, and related legal violations under the laws of various states, including California. Please note that Dongju Son's infringing use of Corsair's CORSAIR mark, particularly with notice, could subject you to a finding of willful infringement and liability to Corsair for treble damages, as well as costs and attorneys' fees for bringing a lawsuit to rectify the situation.

Corsair must protect the substantial investment it has made in its CORSAIR mark against such unauthorized use. Accordingly, we demand that by Friday, **December 28, 2007**, Dongju Son: (1) cease all use of the CORSAIR mark; (2) refrain from adopting and using the CORSAIR mark or any similar marks in the future; (3) transfer the CORSAIR7.COM domain name to Corsair; and (4) refrain from registering any domain name consisting of or including any of Corsair's trademarks, a list of which is enclosed. Dongju Son's agreement may be provided by signing and returning to us the enclosed copy of this letter.

We trust this matter can be resolved amicably. In the absence of a favorable response, however, we will recommend that Corsair take appropriate action to protect its rights in the CORSAIR mark and to collect all damages, profits, costs, and attorneys' fees allowed by law.

Sincerely,



Andrew J. Gray IV

DONGJU SON

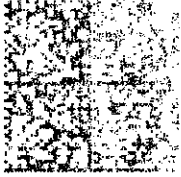
Name: _____

Title: _____

Date: _____

Corsair Memory, Inc.

Trademark Name	App Number	Reg Number
CORSAIR	76535591	3209882
FLASH PADLOCK	77109937	
FLASH VOYAGER	76639271	3089301
FLASH VOYAGER PRODUCT DESIGN	78653454	3257248
MISCELLANEOUS DESIGN (SAILS LOGO)	77025329	3278784
TWINX	76535589	2941168
VALUESELECT	78781839	3171392



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比
人

W 4

<p>2 Palo Alto Square 3000 El Camino Real, Suite 700 Palo Alto, CA 94306</p>		<p>Morgan Lewis C O U N S E L O R S A T L A W</p>	
<p>TO: MP064048 066823 -0016 AJG</p>		<p>Dongju Son Singga Commercial Centre, Rm. 1203-04 148 Connaught Rd. West Hong Kong R.O.C.</p>	
<p>RETURN 退回 RETOUR D'ONGPO Pos 585 (1/2008)</p>		<p>CN15 <input type="checkbox"/> Refused 拒收 <input type="checkbox"/> Refused 拒收 <input type="checkbox"/> Not received 未收到 <input type="checkbox"/> Unclaimed 未領 <input type="checkbox"/> Not valid 無效</p>	
<p>Address of originator service not arranged by addressee L'adresse sans arrangement à faire suivre L'adresse sans arrangement à faire suivre</p>		<p>Complete address 地址不全 Adresse insuffisante</p>	
<p>Wrong address 地址錯誤 Adresse fautive</p>		<p>Wrong address 地址錯誤 Adresse fautive</p>	
<p>Wrong date 日期錯誤 Date fautive</p>		<p>Wrong date 日期錯誤 Date fautive</p>	
<p>Wrong return 退回錯誤 Retour fautive</p>		<p>Wrong return 退回錯誤 Retour fautive</p>	

AIR MAIL

ORIGINAL CIVIL COVER SHEET

JS 44 (Rev. 12/07) (and rev 1-16-08)

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON PAGE TWO OF THE FORM.)

I. (a) PLAINTIFFS

CORSAIR MEMORY, INC.,

DEFENDANTS

CORSAIR7.COM

(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

MORGAN, LEWIS & BOCKIUS LLP
2 Palo Alto Square, 3000 El Camino Real Suite 700
Palo Alto, CA 94306
Tel: 650.843.4000

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

C08 03460

E-filing ADR

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury—Med. Malpractice <input type="checkbox"/> 365 Personal Injury—Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input checked="" type="checkbox"/> 840 Trademark 9
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 226 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities—Employment <input type="checkbox"/> 446 Amer. w/Disabilities—Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) SOCIAL SECURITY <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 FEDERAL TAX SUITS
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C. § 1125(d)(2)

Brief description of cause:

IN REM CYBERSQUATTING UNDER § 1125(d)(2) OF THE LANHAM ACT

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

PLEASE REFER TO CIVIL L.R. 3-12 CONCERNING REQUIREMENT TO FILE "NOTICE OF RELATED CASE".

IX. DIVISIONAL ASSIGNMENT (CIVIL L.R. 3-2) (PLACE AND "X" IN ONE BOX ONLY)

☐ SAN FRANCISCO/OAKLAND

☒ SAN JOSE

DATE
07/17/08

SIGNATURE OF ATTORNEY OF RECORD